COMMENT NO.	AGENCY	COMMENT	RESPONSE
			airplane approach categories. The FAA *Airport Design* manual shows that the 500' width and 1,000' length beyond each runway end is required by C and D aircraft.
5.	USACOE E-mail dated 10/10/2002	Four over shoots were reported in the last 20 years at the KW airport. Please identify the causes of these and relate the incidents to technology, weather, human error. Please state any changes which have taken place to preclude there occurrence and/or; relate any technology which is available but has not been installed which might preclude similar incidents.	Information on past runway excursions at the KWIA is provided below: 1979 – Air Florida B-737: The aircraft overshot the runway and ran off the west end of the runway. Slight aircraft damage. No injuries. 1982 – Cessna Skymaster (Private): The pilot experienced engine problems. The aircraft left the pavement on east end of runway. Gear damage reported . No injuries. 1989 – Eastern Airlines B727: The pilot made a short landing to Runway 9. Minor aircraft damage. 1995 - Cape Air Cessna 402: The baggage door opened while the aircraft was on the runway. The aircraft traveled off east end of runway. Minor aircraft damage reported. No injuries. It is difficult to eliminate through design runway excursions since they may involve pilot error, mechanical failure, or weather (or any combination of these factors). As such, there is currently no technology to prevent runway excursions. The purpose of the proposed RSA is to reduce the potential for loss of life and to minimize damage to aircraft.
6.	USACOE E-mail dated 10/10/2002	The Corps supports the SFWMD's observation that no opportunities for the mitigation of direct impacts are currently known. The unique habitat of the salts ponds may not be replicated at another site.	Comment noted. The lack of land suitable for use for a mitigation project, especially large tracts of land on Key West, is an important consideration in the feasibility study. Further, it is understood that the salt ponds present a unique habitat.
7.	USACOE E-mail dated 10/10/2002	In addition to direct impacts the Corps believes secondary and cumulative impacts regarding this project are potentially more serious than direct impacts. The Corps understands the current passenger total to be between 200k to 300k per year.	The number of passenger enplanements (i.e., the number passenger board aircraft at EYW) in 2001 was approximately 280,000. The forecast prepared as part of the ongoing master plan update indicates that the number of passenger enplanements is expected to increase to 445,000 by the year 2021. This forecast considered both the affects of September 11,

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RUNWAY SAFETY AREA FEASIBILITY STUDY
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COMMENT NO.	AGENCY	COMMENT	RESPONSE
		The airport expansion may double this passenger total. A change in the Cuban government may further increase air traffic in the future. These potential threats to the aquatic environment, involving the full spectrum of effluent, development/growth, boat groundings in seagrass and coral, and other activities should be addressed.	2001 as well as factors unique to Key West, including the potential for reestablishment of diplomatic relations with Cuba. The forecasted number of enplanements is not dependent upon further development of airside or landside facilities at the airport. The proposed RSA improvement project is required for the safety of passengers and aircraft currently using the airport. The RSA will not induce demand, increase capacity, or alter the operational characteristics of the airport.
8.	USACOE E-mail dated 10/10/2002	A complete analysis of alternatives involving the Marathon Airport should be considered. Also the no action scenario should be detailed. What will happen if the permit is not issued?	With respect to the use of Marathon Airport it should be noted that the airline industry was deregulated by the United States Congress in 1978. As a result of this legislation, airlines are free to choose which markets they wish to operate from. The FAA and local governments have no authority to specify which airports airlines must use. It should be noted that detailed alternatives analyses and discussions would be performed in any subsequent NEPA studies and permit applications. The scope of the study at hand is to evaluate the feasibility of implementing a standard RSA. If it is determined by the FAA that providing a standard RSA at the KWIA is not practicable then consideration of other options to provide additional RSA would be evaluated.
9.	USACOE E-mail dated 10/10/2002	In addition to the types of mitigation proposed by the applicant, (exotic removal, creation, enhancement and restoration) for direct impacts;- the applicant should consider acquisition of land for restoration.	Comment noted. The evaluation of conceptual mitigation strategies in the feasibility study will consider reasonably practicable methods of mitigation, including land acquisition.
10.	USACOE E-mail dated 10/10/2002	No proposal for mitigation of secondary/cumulative impacts was presented. The Corps requests the applicant consider a "head tax/user impact fee" based on a per person utilization. For example, a $1.00 start and landing fee per passenger. This dollar could be provided to the Florida Keys Environmental Restoration Trust Fund (FKERTF) to	The scope of the feasibility study includes the evaluation of mitigation strategies available to offset the loss wetlands and other impacts at the project site. The United States Congress banned airport tolls, called head taxes, when it passed the federal Anti-Head Tax Act (49 U.S.C. Section 1513) in 1973. The proposed head tax/user fee cannot be implemented. However, the

COMMENT NO.	AGENCY	COMMENT	RESPONSE
		acquire, enhance, restore, and create wetland and marine resources. The funds would used to off-set secondary and cumulative impacts to the unique and fragile habitats and ecological systems of the Florida Keys. These include; the National Marine Sanctuary, terrestrial wetlands, seagrass beds, coral, water quality projects, etc. The Corps would propose a consumer price index tied increase per year or a percentage increase to account for inflation over time. The FKERTF is administer by the Audubon Society and has had achieved significant success over a number of years. Please consider the above and propose mechanisms for mitigation of the significant secondary and cumulative impacts associated with the project.	required mitigation may be eligible for funding using proceeds from a Passenger Facility Charge (PFC). A PFC can be imposed and collected to pay for discrete, eligible projects at an airport. In this case, the mitigation effort (including mitigation of secondary impacts) would have to be well-defined and include a total project cost. The PFC monies allocated for mitigation would only be collected for the length of time necessary to pay for the project.
11.	USACOE E-mail dated 10/10/2002	The project impacts previous accomplished restoration sites and an area of fresh water lens. Additional mitigation may be required for these areas. Please consider a proposal for mitigation of these resources.	The development and evaluation of mitigation scenarios will include consideration of effect on prior mitigation projects at the airport and adjacent water resources.
12.	USACOE E-mail dated 10/10/2002	Please include impacts to the existing hydrology and how the project would affect adjoining areas.	Comment noted. Detailed hydrological studies would be performed in the course of NEPA environmental documentation and the permit application process.

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RUNWAY SAFETY AREA FEASIBILITY STUDY
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1.	NMFS Letter dated 10/28/2002	According to information provided at the pre-application meeting, the proposed project could directly impact, by filling, 31 acres identified as Essential Fish Habitat by the South Atlantic Fishery Management Council (SAMFC). Categories of EFH found within the project area may include scrub/shrub mangroves, estuarine emergent wetlands, intertidal flats, seagrasses, and coral and hardbottom reef habitats. Several of these categories of EFH have also been designated as Habitat Areas of Particular Concern (HAPC) by the SAMFC.	The comment is noted and will be considered in the final evaluation of anticipated impacts and development of conceptual mitigation strategies. A detailed evaluation of potential impacts would be conducted in any subsequent environmental reviews (i.e., EA/EIS) and permit application(s).
2.	NMFS Letter dated 10/28/2002	Federally managed species associated with mangrove, seagrass, and wetland habitat include postlarval, juvenile, and adult gray, lane and schoolmaster snappers; juvenile Goliath grouper and mutton snapper; and adult white grunt.	The comment is noted and will be considered in the development of conceptual mitigation strategies. A detailed field evaluation of impact would be conducted in any subsequent environmental reviews (i.e., EA/EIS) and permit application(s).
3.	NMFS Letter dated 10/28/2002	At a minimum, the EFH assessment should include the following information: 1. A description of the proposed action; 2. An analysis of the individual and cumulative impacts of the action on EFH, federally managed species, and associated species by life history stage; 3. The Federal Aviation Administration or lead Federal agency" views regarding the effects of the action on EFH; and 4. Any mitigation proposed to minimize and offset adverse project impacts to EFH.	EFH assessment requirements noted. An EFH assessment would be conducted in any subsequent environmental reviews (i.e., EA/EIS) and permit application(s).
4.	NMFS Letter dated 10/28/2002	In addition, we recommend that you include the following information in the assessment: 1. A detailed analysis of alternatives to the	Additional EFH assessment requirements noted. An EFH assessment would be conducted in any subsequent environmental reviews (i.e., EA/EIS) and permit application(s).

		proposed action including the use of Engineering Materials Arresting Systems, a smaller-scale project, a combination of both the aforementioned alternatives, use of the Marathon and Miami International Airports, and the no action alternative; 2. Information regarding the purpose or need to impact wetlands, efforts to avoid and minimize adverse impacts to the wetlands, and measures that would be implemented to offset (compensate for) unavoidable impacts to EFH and other habitats and living marine resources; and 3. A review of pertinent scientific literature concerning specific habitats and species that may be directly or indirectly affected by the proposed action, and potential short-term and long-term effects on these habitats and species.	

AGENCY COMMENTS
RUNWAY SAFETY AREA FEASIBILITY STUDY
KEY WEST INTERNATIONAL AIRPORT

1	SFWMD Letter Dated 11/7/2002	Prior to formally discussing mitigation options related to project development the applicant must demonstrate that avoidance and/or minimization of wetland impacts has been implemented to the greatest extent possible. The proposal presented during the October 8, 2002 meeting and indicated on the exhibits provided depict the standard Runway Safety Area (RSA) that the FAA desires to achieve. District staff is aware that the desired footprint for a RSA has flexibility (Ft. Lauderdale Airport) and may be reduced due to surrounding land uses and characteristics. District staff requests that the FAA define the least impactive alternative utilizing standard construction techniques.	The regulatory process of first addressing avoidance and minimization is recognized and understood. However, when dealing with safety issues to minimize the potential for loss of life, the FAA must evaluate and make a determination of the practicability of providing a standard RSA before it can consider other options to provide additional RSA at an airport (FAA Order 5200.8, *Runway Safety Area Program*). Safety of the flying public is a primary concern. Given the setting of the KWIA, potential issues related to obtaining environmental permits and approvals and the probable cost of mitigation are some of the significant factors used by the FAA in determining whether to pursue the standard RSA or evaluate other options to provide additional RSA. The purpose of this feasibility study is to provide information on which the FAA can make such a determination.
2.	SFWMD Letter Dated 11/7/2002	Will additional lighting be required within the RSA? If so, please demonstrate that this lighting is down-shielded to ensure that light is retained within the boundaries of the site. Please be aware that any increased lighting will require that the effects of this lighting on wildlife be evaluated.	The construction of the RSA should not involve additional lighting. Airport design standards do not require lighting for RSAs.
3.	SFWMD Letter Dated 11/7/2002	Development of the RSAs, as proposed, will directly impact sensitive mangrove, salt pond and herbaceous wetlands communities. Additionally, secondary impacts associated with the development, including buffer encroachments and fragmentation will require quantification. Cumulative impacts must be addressed as well. Also, numerous mitigation/environmental enhancement projects have been completed within the salt ponds. The salt pond area provides unique wetland functions. Functions provided must be evaluated and a mitigation plan be developed within close proximity to the impact area designed to offset impacts to the functions provided by these wetland communities. Time lag and risk must be factored into any mitigation plan developed. What mitigation options have been identified to offset	Comments regarding direct, secondary, and cumulative impacts are noted. A detailed analysis of impacts would be conducted in any subsequent environmental reviews (i.e., EA/EIS) and permit applications. The feasibility study will develop and evaluate conceptual mitigation strategies for the standard RSA. After the December 5, 2002 site meeting, work on the conceptual mitigation strategies will commence. During the development of the mitigation strategies, agencies will be contacted to provide preliminary input and feedback. Detailed mitigation plans will not be developed as part of this feasibility study. If the decision is made to pursue a standard RSA, detailed plans would be formulated through the environmental review and permit application process.

		these direct, secondary and cumulative impacts?	
4.	SFWMD Letter Dated 11/7/2002	District staff has concerns related to potential impacts to listed species, including migratory species that may be incurred with project development. Please provide the following information: A Please provide information relative to the potential impacts to internationally migrating bird species that migrate yearly to/from the northern United States and Canada to/from the Caribbean, Central and South America. In addition, please provide any known information regarding the flight pattern(s) of the bird species that may utilize this area as part of their migratory route. B. Please provide information relative to the potential impacts to local wetland dependent species that migrate daily within the region. Please provide any known information regarding the flight pattern of wetland dependent bird species that may cross the area, specifically, birds utilizing identified colonial roosting and rookery sites and their known relationship to known wetland forage habitat. C. Please address any potential direct or secondary impacts to listed bird species resulting from the proposed project. Please identify how these impacts will be offset.	Comments regarding potential impact to listed species are noted. A detailed evaluation of impact to listed and migratory species would be conducted in any subsequent environmental review (i.e., EA/EIS) and permit application process.
5.	SFWMD Letter Dated 11/7/2002	Additional impervious areas will require water quality treatment. Please identify the methods of water quality treatment, location for these facilities and identify additional wetland impacts resulting from the stormwater management areas.	Comment regarding storm water and potential for additional wetland impact is noted. It should be noted that an RSA is typically an earthen structure with a permeable, grassed surface. The proposed RSA infrastructure will be required to incorporate collection

			and treatment of storm water in accordance with applicable regulations. However, the location and methods of collection and treatment have not been determined or designed at this time. Detailed studies regarding storm water will be conducted in any subsequent environmental review (i.e., EA/EIS) and permit application process.
6.	SFWMD Letter Dated 11/7/2002	How will proposed salt pond impacts effect groundwater recharge, storage, offsite impacts related to loss of storage and local hydrology?	Comment regarding potential hydrological impact is noted. Detailed hydrological studies would be performed in the course of any subsequent environmental review and the permit application process.
7.	SFWMD Letter Dated 11/7/2002	District staff, during a previous meeting, was informed that larger jets are not proposed to be utilized at this location. However, several weeks ago Key West International Airport announced new direct-connect flights from out-of-state. Additionally, FAA stated during the meeting that they could not restrict or limit the flights or types of airlines utilizing this facility. If the runway safety area is constructed in accordance with the plan, what limitations could be placed on this facility to prevent the utilization of the RSA as a runway extension for larger or more fully loaded aircraft? In turn, what limitations could be imposed to ensure that future airport demands would not necessitate additional runway safety improvements?	The use of an RSA for additional runway pavement, under certain conditions, is allowed by the FAA. However, any such proposal will first require local support and approval as most airport development projects are initiated at the local level. If federal funding is requested for a runway extension, the FAA will require a detailed justification study to document the need for the additional runway length and the proposal will be subject to environmental review under the NEPA. In regards to future additional runway safety improvements, the proposed RSA will meet design criteria for the aircraft operating at the airport and those expected to operate at the airport in the foreseeable future. The proposed RSA will accommodate all C and D aircraft and should not require further expansion.
8.	SFWMD Letter Dated 11/7/2002	Please provide an evaluation detailing the reasons why Marathon Airport could not be modified to provide the safety features desired while resulting in less impacts than the current proposal.	As noted previously, the airline industry was deregulated by the United States Congress in 1978. As a result of this legislation, airlines are free to choose which markets they wish to operate from. The FAA and local governments have no authority to specify which airports airlines must use. Physical constraints, including insufficient runway-to-taxiway separation distance, is a design issue at the Marathon Airport.
9.	SFWMD Letter Dated 11/7/2002	During the October 8, 2002 meeting privately owned structures/development where identified within the RSA. How will these facilities impact the ability for	All structures and objects within the limits of the proposed RSA would have to be removed and/or meet grade and frangibility requirements.

		KWIA to effectively implement RSA improvements? It appears that hardened structures and development would be more damaging, both to the airlines and people located within the structures, than the vegetation proposed for destruction. Please define the flexibility FAA has in determining variances to their guidelines.	On a case-by-case basis, the FAA will consider requests for Modification to Standards for Object Free Areas as long as the airport sponsor can prove that the proposed modification provides an acceptable level of safety. However, the FAA does not consider, under any circumstances, modification of RSA standards.
10.	SFWMD Letter Dated 11/7/2002	Discussions regarding the Engineering Materials Arresting Systems (EMAS) material utilization for aircraft safety indicated that this material would serve the safety function desired, could be placed in a much smaller area resulting in a minimization of wetland impacts and restrict the RSA from being used as a runway extension. FAA stated that, if damaged, the material was expensive to repair. Has consideration been given to passing this repair expense on to the air carrier causing the damage?	Passing EMAS repair costs on to a operator or carrier that used or otherwise damaged the EMAS can be considered. Collecting reimbursement for damages could not be assured in all cases, possibly leaving Monroe County responsible for the cost of repair.

1.	USEPA Letter Dated 11/20/2002	What is the basis for the projected increase in operations from 2001 to 2011 (11.8% increase) to 2020(18.1% increase)?	The FAA Terminal Area Forecast (TAF) contains historical aviation activity data and FAA's forecasts for airports in the National Integrated Airport Plan. FAA forecasts of aviation activity are developed using a combination of statistical methods to produce data for national, regional, and local (airport) levels. The forecasts rely on historic data to evaluate past activity and identify trends. At the KWIA, records show that passenger enplanements increased approximately 48.4% from 1990 through 2000 (FAA TAF). The projections also include consideration of factors that may affect activity. In the case of Key West, continued growth in tourism and related recreational activities are factors influencing airport activity and projections.
2.	USEPA Letter Dated 11/20/2002	We note that 31 acres of wetlands (page 4 classifies wetlands as "bays and estuaries, mangrove swamp; exposed rock with marsh grasses") are predicted to be lost if the proposed project is implemented. More specifically, the proposed extension of the RSAs to meet FAA standards would impact mangroves on the eastern end (Runway 27) of the runway and open water habitat on the western end (Runway 9). This Key West Salt Ponds aquatic system provides important habitat for water fowl and wading birds and is only one of two remaining natural systems in Key West. We preliminarily agree that the 31-acre quantification is accurate and believe such acreage is substantive for a limited landscape, such as Key West.	Comments regarding available habitat for water fowl and wading birds is noted. Comment regarding preliminary direct impact quantification is also noted. These will be considered in detail in any subsequent environmental review and permit application process.
3.	USEPA Letter Dated 11/20/2002	The runway Object Free Areas (OFAs) would normally increase the cleared area beyond the RSA dimensions (to 800' x 1000' in this case), which would result in an additional 11.5 acres of cleared wetlands. However, the document suggests that FAA may elect to modify that requirement and limit the OFA to the RSA dimensions. The final document should clarify that requirement and also depict the wetlands located within the 800' x 1000' dimensions	Comments regarding the Runway Object Free Area and its potential additional impact to wetlands are noted.

		in Figure 4.1-1. If the 11.5 acres are cleared, EPA would consider the wetland losses for this proposal to be 42.5 acres (31 ac + 11.5 ac). Although not grubbed, the 11.5 acres are included in the wetland loss total due to the loss of habitat values incurred through clearing.	
4.	USEPA Letter Dated 11/20/2002	Alternatives to expand RSAs appear to be limited on either end of the runway. Since the present document is a feasibility study, various options should still be explored and disclosed in the final document. We also note that page 4 indicates that FAA Order 5200.8 states that: *When making determinations about the practicability of obtaining the RSA, the first attempt shall consist of investigating fully the possibility of obtaining an RSA that meets the current standards through a traditional graded area surrounding the runway.* It is unclear if there are any FAA exemptions or modifications to FAA Order 5200.8 for sensitive natural areas (e.g., are there any *non-traditional* options to grading the area to avoid or minimize losses to sensitive natural areas?). The final document should discuss this. Such options and exemptions, however, should not compromise airport runway safety.	The scope of the feasibility study is limited to the evaluation of the practicability of implementing a standard RSA at the airport. In regard to exemptions or modifications, FAA Advisory Circular 150/5300-13 *Airport Design* states the following: "RSA standards cannot be modified or waived like other airport design standards. The dimensional standards remain in effect regardless of the presence of natural or man-made objects or surface conditions that might create a hazard to aircraft that would leave the runway surface."
5.	USEPA Letter Dated 11/20/2002	If the project is pursued and given that alternatives to avoid sensitive natural areas appear limited and FAA exemptions unclear, mitigation must be considered. EPA suggests that any such mitigation be greater than 1:1 and be provided onsite, or at least in the lower Florida Keys. However, we are not aware of sites large enough for such mitigation in the Keys. What type of mitigation and at what sites would the airport Sponsor offer to compensate for losses to mangroves, Key West Salt Ponds and other lost/affected resources due to the proposal?	Comments regarding mitigation and the apparent lack of potential mitigation sites are noted. The feasibility study will develop and evaluate conceptual mitigation strategies and probable costs based on the standard RSA. After the December 5, 2002 site meeting, work on the conceptual mitigation strategies will commence. During the development of mitigation strategies, agencies will be contacted to provide preliminary input and feedback. Detailed mitigation plans will not be developed as part of this feasibility study. If the decision is made to pursue a standard RSA, detailed plans would be formulated through the environmental review and permit application process.

6.	USEPA Letter Dated 11/20/2002	In summary, EPA has concerns with the proposed project due to the quantity and quality of the wetlands and other natural resources that would be lost on either end of the KWIA runway. As a feasibility study, various options should still be explored and disclosed in the final document that would not compromise airport runway safety. If the proposal is pursued, mitigation for wetlands and Key West Salt Ponds should be coordinated with the U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service and EPA.	Summary comments noted.

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RUNWAY SAFETY AREA FEASIBILITY STUDY
KEY WEST INTERNATIONAL AIRPORT

1.	USFWS Letter Dated 11/15/2002	If the no action alternative were to be pursued, would the FAA continue to authorize airport operations?	The FAA is committed to improving the RSA at the KWIA. If it is determined that a standard RSA a standard RSA at the KWIA is not practicable, then other options to provide additional RSA will be evaluated.
2.	USFWS Letter Dated 11/15/2002	If the project as proposed were not to be pursued, could the airport continue to provide commercial service by accommodating smaller planes that would not need the additional RSA to function within FAA regulations?	If a determination is made that a standard RSA is not practicable, operations would continue, presumably, with the same aircraft mix as currently serving the airport. The airlines serving the airport determine which aircraft will be assigned for flights in and out of the airport.
3.	USFWS Letter Dated 11/15/2002	If larger planes could not land here due to the lack of suitable RSAs, could the FAA downgrade the EYW Airport Reference Code to reflect the current airfield design and still accommodate smaller commercial aircraft? Would this be an option for the FAA; and if not, why?	Available runway length is the primary consideration in regards to aircraft take-off and landing requirements. The airlines have determined that the existing runway can support operations by regional jets. The Airport Reference Code and associated design criteria are determined by the aircraft that use the airport. It should be noted that the commercial turboprop fleet being replaced at KWIA also required RSA improvements.
4.	USFWS Letter Dated 11/15/2002	Will the proposed RSAs increase commercial passenger jet traffic, size of aircraft, and the size of the loads that the current planes can carry? Would the proposed RSAs allow larger jets to land in Key West?	No. The proposed RSA improvement project is required for current airport operations and will not induce demand, increase capacity, or alter the operational characteristics of the airport.
5.	USFWS Letter Dated 11/15/2002	Are there currently buildings or other structures in the proposed RSAs or clear zones, which would be allowed to remain?	All structures and objects within the limits of the proposed RSA would have to be removed and/or meet grade and frangibility requirements. Off-airport objects are located within the proposed Runway Object Free Area. However, at this time, no objects have yet been identified, or otherwise proposed, to remain in place within the Runway Object Free Area (OFA). On a case-by-case basis, the FAA will consider requests for Modification to Standards for Object Free Areas as long as the airport sponsor can prove that the proposed modification provides an acceptable level of safety. However, the FAA does not consider, under any

			circumstances, modification of RSA standards.
6.	USFWS Letter Dated 11/15/2002	While the airport cannot dictate that a certain type of plane cannot land at the airport, can the FAA regulate the size or payload of the planes that do land here? Is the FAA obligated to provide RSAs for all type of planes that want to land here?	An airport operator can impose some operational requirements. The requirements are usually based on runway pavement strength limitations. The airport sponsor or the FAA is not obligated to provide facilities for all aircraft types that may use a facility. Design standards for a particular airport are based on the airport's Airport Reference Code. The ARC is based on the most demanding aircraft generating at least 500 annual operations operating at the airport.
7.	USFWS Letter Dated 11/15/2002	Currently there is a trend for airlines to trim their fleets, restructure routes, and resize aircraft to stay competitive. Is the FAA's safety program bound by accommodating the current airline market based on plane size? If left to free market forces will the airline industry fill the niche for Key West, even if only smaller planes are authorized to land in Key West? Is the FAA bound to the current ARC status or could they change the status to accommodate smaller planes within the current air field and existing RSAs?	A significant trend among air carriers is to replace turboprop aircraft serving smaller markets with regional jets. In regards to safety, airport design standards are based an airport's Airport Reference Code, which is determined by the most demanding aircraft generating at least 500 annual operations operating at the airport. An airline's decision to serve a market is based on profitability. The question of whether an airline would serve the Key West market with smaller aircraft is unknown. It should be noted that the commercial turboprop fleet being replaced at KWIA also required RSA improvements. The existing RSA would require some improvement even if the ARC was lowered to the least demanding classification.
8.	USFWS Letter Dated 11/15/2002	The presence or absence of Lower Keys marsh rabbits and silver rice rats on the EYW property must be conclusively determined. URS should contact Craig Faulhaber, the current Lower Keys marsh rabbit researcher, at 305-872-9412 or 305-515-0280.	Comment and contact information regarding the Lower Keys marsh rabbit and silver rice rat is noted. Potential impact to protected species will be addressed in any subsequent environmental studies and permit application process.
9.	USFWS Letter Dated 11/15/2002	Explore and develop alternative options to the current proposed RSA plans. These alternative techniques should strive to avoid impacts, and when avoidance cannot be accomplished, they	The scope of the feasibility study is limited to the evaluation of the practicability of providing a standard RSA at the airport. The safety of passengers and aircraft are a paramount concern and the standard RSA must be evaluated before other options can be considered.

		should strive to minimize impacts to saltmarsh, mangrove, and saltpond habitats, yet still allow the EYW to meet some FAA RSA goals.	
10.	USFWS Letter Dated 11/15/2002	Consider avoiding direct impacts to existing bodies of water and mangrove stands by incorporating these features into the RSA specifications.	The proposed standard RSA will have to meet dimensional, surface, and grade requirements necessary to support an aircraft and emergency vehicles.
11.	USFWS Letter Dated 11/15/2002	Consider proposing the RSA project in already scarified areas around the airfield, or in areas of lesser habitat quality.	The proposed standard RSA will have to meet dimensional, surface, and grade requirements necessary to support an aircraft and emergency vehicles.
12.	USFWS Letter Dated 11/15/2002	Consider proposing the project in a way such that mangrove dominated wetlands are not filled but are left in place to provide critical ecological functions, yet be managed by foliage trimming so as to achieve a partial goal of the RSA.	The standard RSA design criteria requires a ground surface capable of supporting an aircraft and emergency equipment. This feasibility study offers a possible measure to reduce mangrove habitat clearing impacts at the airport by reducing the width of the OFA to match the width of the RSA.
13.	USFWS Letter Dated 11/15/2002	Consider not filling salt ponds or saltmarshes but working around these to achieve a partial RSA in areas that are currently scarified or have minimal quality wetlands.	The proposed standard RSA will have to meet dimensional, surface, and grade requirements necessary to support an aircraft and emergency vehicles.
14.	USFWS Letter Dated 11/15/2002	Explore the option of minimizing the proposed project footprint to not include the large impact area to the dense mangrove stand on the east end of the runway.	The proposed standard RSA will have to meet dimensional requirements as specified in the FAA *Airport Design* Advisory Circular.
15.	USFWS Letter Dated 11/15/2002	Consider shifting the runway to the west where there are lesser impacts to mangroves, while still achieving a partial RSA, and without compromising approach runway protection zones.	The safety of passengers and aircraft is critical and the standard RSA must be evaluated before other options can be considered. Shifting the runway to the west has the potential for generating social impacts related to noise and overflights. Land uses potentially affected include residences and a public school.

AGENCY COMMENTS
RUNWAY SAFETY AREA FEASIBILITY STUDY
KEY WEST INTERNATIONAL AIRPORT

16.	USFWS Letter Dated 11/15/2002	Explore newer technologies in aircraft overshoot arresting systems, which would not directly impact wetland habitats.	The FAA must evaluate and make a determination of the practicability of providing a standard RSA before considering other options.
17.	USFWS Letter Dated 11/15/2002	Develop a suite of both onsite and offsite mitigation options (e.g., restoration, enhancement, exotic removal, land acquisition, etc.) after exhausting the options available for avoiding and minimizing wetland impacts.	The conceptual mitigation strategies will consider a combination of methods, including restoration, enhancement, exotic removal, and land acquisition. In regards to avoidance and minimization, the FAA must evaluate and make a determination of the practicability of providing a standard RSA before considering other options of providing additional RSA.
18.	USFWS Letter Dated 11/15/2002	Include effects of airfield operations on the protected bald eagle and its nest and fledgling in the current proposal. You may also want to coordinate this effort with other airports in Monroe County.	Comment regarding bald eagle and nesting is noted. A detailed evaluation of impact to protected species would be conducted in any subsequent environmental review (i.e., EA/EIS) and permit application process.

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URS

November 13, 2002

Mr. Bill Kruczynski
US Environmental Protection Agency, Region 4
Post Office Box 500368
Marathon, Florida 33050

RE: PREAPPLICATION MEETING AND SITE VISIT
RUNWAY SAFETY AREA FEASIBILITY STUDY
KEY WEST INTERNATIONAL AIRPORT
MONROE COUNTY, FLORIDA

Dear Mr. Kruczynski:

A pre-application meeting and site visit will be conducted to further discuss the feasibility of implementing the proposed improvements to the Runway Safety Area at the Key West International Airport. The purpose of the meeting will be to discuss the proposed project, permitting issues and concerns, and the development of conceptual mitigation strategies. A review of the project site will be conducted.

The meeting will be held at the Key West International Airport at 1:00 p.m. on Thursday, December 5, 2002. The meeting will convene in the Board Room located in the administrative offices in the passenger terminal building. The airport is located at 3491 S. Roosevelt Boulevard, Key West Florida.

An agenda and summary of agency comments will be sent to you prior to the meeting.

We appreciate your time and consultation on this matter.

Sincerely,

URS CORPORATION

Peter M. Green, AICP
Senior Airport Environmental Planner

Copy: Mr. Peter Horton, Monroe County/Key West International Airport
Ms. Virginia Lane, Federal Aviation Administration
Mr. Mil Reisert, URS Corporation
Mr. George Feher, URS Corporation

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7650 West Courtney
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URS

November 13, 2002

Andrew Gude
Fish and Wildlife Biologist
US Fish and Wildlife Service
Key Deer Visitors Center
Winn Dixie Plaza
Big Pine Key, Florida 33043

RE: PREAPPLICATION MEETING AND SITE VISIT
RUNWAY SAFETY AREA FEASIBILITY STUDY
KEY WEST INTERNATIONAL AIRPORT
MONROE COUNTY, FLORIDA

Dear Mr. Gude:

A pre-application meeting and site visit will be conducted to further discuss the feasibility of implementing the proposed improvements to the Runway Safety Area at the Key West International Airport. The purpose of the meeting will be to discuss the proposed project, permitting issues and concerns, and the development of conceptual mitigation strategies. A review of the project site will be conducted.

The meeting will be held at the Key West International Airport at 1:00 p.m. on Thursday, December 5, 2002. The meeting will convene in the Board Room located in the administrative offices in the passenger terminal building. The airport is located at 3491 S. Roosevelt Boulevard, Key West Florida.

An agenda and summary of agency comments will be sent to you prior to the meeting.

We appreciate your time and consultation on this matter.

Sincerely,

URS CORPORATION

Peter M. Green, AICP
Senior Airport Environmental Planner

Copy: Mr. Peter Horton, Monroe County/Key West International Airport
Ms. Virginia Lane, Federal Aviation Administration
Mr. Mil Reisert, URS Corporation
Mr. George Feher, URS Corporation

URS Corporation
7650 West Courtney
Campbell Causeway
Tampa, FL 33607-1462
Tel: 813.286.1711
Fax: 813.287.8591

URS

November 13, 2002

Anita R. Bain
Sr. Supervising Environmental Analyst
Natural Resources Management Department
South Florida Water Management District
3301 Gun Club Road
West Palm Beach, Florida 33406

RE: PREAPPLICATION MEETING AND SITE VISIT
RUNWAY SAFETY AREA FEASIBILITY STUDY
KEY WEST INTERNATIONAL AIRPORT
MONROE COUNTY, FLORIDA

Dear Ms. Bain:

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URS

November 13, 2002

Paul Kruger
US Army Corps of Engineers
Regulatory Division, Miami Field Office
Suite 104
11420 North Kendall Drive
Miami, Florida 33176-1039

RE: PREAPPLICATION MEETING AND SITE VISIT
RUNWAY SAFETY AREA FEASIBILITY STUDY
KEY WEST INTERNATIONAL AIRPORT
MONROE COUNTY, FLORIDA

Dear Mr. Kruger:

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